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July 15, 2022

**Via ECF**

The Honorable Jessica S. Allen

United States District Court

Martin Luther King, Jr. Federal Building & U.S. Courthouse

50 Walnut Street, Newark, New Jersey 07102

**Re: *IQVIA Inc. et al. v. Veeva Systems, Inc., No. 2:17-cv-177-JXN-JSA ("IQVIA I")*  
*IQVIA Inc. et al. v. Veeva Systems, Inc., No. 2:19-cv-15517-JXN-JSA ("IQVIA II")***

Dear Judge Allen:

The parties jointly submit the attached [Proposed] Amended Pretrial Scheduling Order in these actions for Your Honor's consideration.

The parties' Proposed Order would modestly extend the time allotted for the parties to serve responsive expert reports. The July 1, 2022 Amended Pretrial Scheduling Order requires the parties to serve responsive expert reports approximately two weeks after affirmative expert reports are due, whereas the May 3, 2022 Amended Pretrial Scheduling Order set the deadline for responsive expert reports approximately six weeks after affirmative expert reports are due. *See* ECF Nos. 141, 160, *IQVIA II*; ECF Nos. 445, 452, *IQVIA I*. The parties respectfully request that the Court restore the six-week period from earlier scheduling orders.

The parties' Proposed Order would also modestly extend the time allotted for expert discovery after reply expert reports are served. These deadlines will now fall during the holidays, and including additional time will make it easier to schedule expert depositions.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Amy Luria

Amy Luria

*Attorney for IQVIA*

/s/ David N. Cinotti

David N. Cinotti

*Attorney for Veeva*

CC: Counsel of record

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IQVIA INC. and IMS SOFTWARE  
SERVICES, LTD.,

*Plaintiffs-Counterclaim  
Defendants,*

v.

VEEVA SYSTEMS INC.,

*Defendant-Counterclaim  
Plaintiff.*

Civil Action No. 17-177 (JXN)

Hon. Julien X. Neals, U.S.D.J.  
Hon. Jessica S. Allen, U.S.M.J.

**[PROPOSED] AMENDED PRETRIAL  
SCHEDULING ORDER**

Pursuant to agreement of the Parties, and for good cause shown, the Court hereby

**ORDERS THAT:**

1. The deadline for serving all affirmative expert reports remains **September 30, 2022**.
2. The deadline for serving all responsive expert reports is extended through **November 16, 2022**.
3. The deadline for serving all reply expert reports is extended through **December 16, 2022**.
4. The deadline for the completion of all expert discovery is extended through **January 13, 2022**.

**SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE JESSICA S. ALLEN  
UNITED STATES MAGISTRATE JUDGE